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9 **Attorneys for Plaintiff**  
10 **J & J SPORTS PRODUCTIONS, INC.**

11 **UNITED STATES DISTRICT COURT**  
12 **FOR THE**  
13 **NORTHERN DISTRICT OF CALIFORNIA**

14 **J & J SPORTS PRODUCTIONS, INC.,**

15 **PLAINTIFF,**

16 **V.**

17 **BLANCA E. BOUTON, ET AL.**

18 **DEFENDANTS/**  
19 **THIRD-PARTY PLAINTIFFS/**  
20 **COUNTER-DEFENDANTS**

21 **V.**

22 **DIRECTV LLC, ET AL.,**

23 **THIRD-PARTY DEFENDANTS/**  
24 **COUNTER-CLAIMANTS**

25 **CASE NO. 3:12-cv-05762-RS**

26 **ORDER**

27 **JOINT STIPULATION TO EXTEND**  
28 **NON-EXPERT DISCOVERY**  
**DEADLINE (~~Proposed~~)**

**TO THIS HONORABLE COURT:**

By and through their counsel, Plaintiff J & J Sports Productions, Inc., Defendants/Third-Party Plaintiffs/Counter-Defendants Blanca E. Bouton, Jose David Monterrubio, and Third-Party Defendants/Counter-Claimants DirecTv, LLC and DirecTv International, Inc. hereby agree, stipulate,

**STIPULATION TO CONTINUE DISCOVERY CUTOFF**  
**AND ORDER (Proposed)**  
**CASE NO. CV 12-05762**  
**PAGE 1**

1 and respectfully request that this Honorable Court extend the non-expert discovery deadline in this  
2 action, presently set for March 1, 2016, to a new date approximately sixty (60) days forward, and in  
3 support aver as follows:  
4

5 WHEREAS, there is presently a non-expert discovery deadline of March 1, 2016, scheduled  
6 in this action (ECF #66).

7 WHEREAS, Defendants Blanca E. Bouton and Jose David Monterrubio wish to conduct the  
8 deposition of Mr. Joseph M. Gagliardi, President of J & J Sports Productions, Inc., as well as the  
9 deposition of the Person Most Knowledgeable of Plaintiff J & J Sports Productions, Inc.  
10

11 WHEREAS, Joseph M. Gagliardi, President and Person Most Knowledgeable of J & J Sports  
12 Productions, Inc. is not available for deposition prior to presently existing non-expert discovery  
13 deadline of March 1, 2016.  
14

15 WHEREAS, the trial in this action is presently scheduled for September 19, 2016 (ECF #66).

16 WHEREAS, this is the first extension of the non-expert discovery deadline being requested by  
17 the Parties and the Parties do not anticipate any further extension of this particular extension of  
18 deadline will be necessary.  
19

20 **WHEREFORE**, The Parties respectfully request that this Honorable Court extend the non-  
21 expert discovery deadline in the above-entitled action, presently set for March 1, 2016, to a new date  
22 (May 1, 2016) approximately sixty (60) days forward.  
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<u>Event</u>	<u>Current Date</u>	<u>Proposed New Date</u>
Non-expert Discovery Deadline	March 1, 2016	May 1, 2016

Respectfully submitted,

Dated: February 9, 2016

/s/ Thomas P. Riley

**LAW OFFICES OF THOMAS P. RILEY, P.C.**

By: Thomas P. Riley

Attorneys for Plaintiff

J & J Sports Productions, Inc.

Dated: February 10, 2016

/s/Trevor Brandt McCann

**LAW OFFICES OF TREVOR BRANDT**

**McCANN**

By: Trevor Brandt McCann

Attorneys for Defendants/Third-Party Plaintiffs/

Counter Defendants

Blanca E. Bouton and Jose David Monterrubio

Dated: February 10, 2016

/s/Ryan Geoffrey Baker

**BAKER MARQUART, LLP**

By: Ryan Geoffrey Baker

Attorneys for Defendants/Third-Party Defendants/Counter  
Claimants

DirecTv International, Inc., DirecTv Inc., DirecTV LLC

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**ORDER** (~~Proposed~~)

**IT IS HEREBY** ordered that the non-expert discovery deadline in the above-entitled action is hereby extended from March 1, 2016 to May 31, 2016.

**IT IS SO ORDERED:**



Honorable Richard Seeborg  
United States District Court  
Northern District of California

Dated: 2/12/16

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